

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA**  
Harrisburg Division

ASHLEY ADAMS,

*Plaintiff,*

v.

Case No.: 5:21-cv-00006-TTC

ROCKINGHAM COUNTY,

*Defendant.*

**PLAINTIFF’S OPPOSITION TO DEFENDANT ROCKINGHAM COUNTY’S  
MOTION TO DISMISS**

Plaintiff, Ashley Adams, by and through her counsel of record, hereby submits this Opposition and supporting Memorandum of Points and Authorities to Defendant’s Fed. R. Civ. P. 12(b)(6) Motion to Dismiss (“Motion”).

For the reasons set forth in Ms. Adams’ supporting Memorandum of Points and Authorities, Plaintiff respectfully requests the Court deny Defendant’s Motion in its entirety and grant Ms. Adams such other relief as the Court deems just and appropriate.

Respectfully Submitted,

/s/ Joanne Dekker

Joanne Dekker

Virginia State Bar No. 29941

The Spiggle Law Firm, PLLC

4830A 31st St., S., Suite A

Arlington, Virginia 22206

Telephone: (202) 449-8527

Facsimile: (202) 517-9179

E-Mail: [jdekker@spigglelaw.com](mailto:jdekker@spigglelaw.com)

*Counsel for Plaintiff, Ashley Adams*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 22, 2021, I have electronically filed this document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Rosalie Pemberton Fessier, Esq.  
Mandi Montgomery Smith, Esq.  
Brittany E. Shipley, Esq.  
Timberlake**Smith**  
25 North Central Avenue  
P.O. Box 108  
Staunton, VA 24402-0108  
Telephone: (540) 885-1517  
Facsimile: (540) 885-4537  
E-Mail: [rfessier@timberlakesmith.com](mailto:rfessier@timberlakesmith.com)  
[msmith@timberlakesmith.com](mailto:msmith@timberlakesmith.com)  
[bshipley@timberlakesmith.com](mailto:bshipley@timberlakesmith.com)

*Attorneys for Defendant, Rockingham County*

/s/Joanne Dekker  
Joanne Dekker, Esq.